IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA WAYCROSS DIVISION

UNITED STATES OF AMERICA) CASE# 5:21CR00009
)
VS.)
)
)
Charles Michael King)
Defendant	

UNOPPOSED MOTION TO PERMIT TRAVEL

Comes now, the above named defendant, Charles Michael King and files this UNOPPOSED Motion to permit travel and shows the Court the following:

- a. Charles Michael King is currently on a pretrial release in the above-referenced case.
- b. An order setting conditions of release was signed by Judge Benjamin W. Cheesbro on November 23, 2021. [Document 126]
- c. Under the additional conditions of release section in the order setting conditions of release [Document 126], in paragraph 7, subsection (f): "Travel is Restricted to the Southern District of Georgia"
- d. Defendant respectfully requests to be able to travel to accompany a family member to attend the National Championship Football game in Inglewood, California.
- e. The defendant respectfully requests leave to travel January 8, 2023 and return January 10, 2023.
- f. The defendant would be flying out of Gainesville, Florida and flying into San Diego, then traveling by car with his stepson to Inglewood California.
- g. The Defendant would be staying at the Fairfield Inn & Suites San Diego Pacific Beach, located at 4345 Mission Bay Drive, San Diego, CA USA 92109.

- h. Defendant's counsel has conferred with Assistant United States Attorney Tania Groover and this motion is unopposed by the Government.
- The defendant is not asking to modify any other conditions of pretrial release and Defendant will continue to abide by all conditions of pretrial release as ordered.

WHEREFORE, the defendant, Charles Michael King prays that his Motion to Permit Travel be Granted and he be permitted to travel to watch the Georgia Bulldogs play in the 2023 National Championship at Sofi Stadium in Inglewood, California

Respectfully submitted this 6th day of January 2023

/S/Jack M. Downie Sr. JACK M. DOWNIE Sr. Georgia Bar # 813753 Post Office Box 926 Vidalia, Georgia 30475 (912) 537-9265 jack@downielaw.net

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the directives from the Court Notice of Electronic Filing ("NEF") which was generated as a result of electronic filing.

Respectfully submitted this 6th day of January 2023

/S/Jack M. Downie JACK M. DOWNIE Georgia Bar # 813753 Post Office Box 926 Vidalia, Georgia 30475 (912) 537-9265

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